

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

RASHETA BUNTING, Individually and
as representative of a class of similarly situated persons,

Plaintiff,

against -

QC TERME NY LLC,

Defendant.

Case No. 1:23-cv-4478

**JOINT STIPULATION FOR DISMISSAL OF ENTIRE ACTION WITH
PREJUDICE PURSUANT TO F.R.C.P. 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff RASHETA BUNTING ("Plaintiff") and Defendant QC TERME NY LLC ("Defendant") stipulate and jointly request that this Court enter a dismissal with prejudice of Plaintiff's Complaint in the above-entitled action in its entirety, with the Court to retain jurisdiction over the parties and the action for 24 months for the sole purpose of enforcement of the parties' obligations under their Confidential Settlement Agreement and General Release, including Defendant's good faith efforts regarding ADA Compliance.

Each party shall bear her or its own fees, costs and attorneys' expenses.

Respectfully submitted,

Date: Aug. 31, 2023

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*ATTORNEYS FOR PLAINTIFF AND THE
CLASS*

Dated: September 6, 2023

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